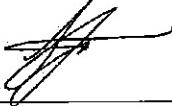


Approved:


SHIVA H. LOGARAJAH/JACOB WARREN/
DAVID R. FELTON/ADAM HOBSON
Assistant United States Attorneys

Before: HONORABLE ANDREW E. KRAUSE
United States Magistrate Judge
Southern District of New York

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:

UNITED STATES OF AMERICA, : **SEALED COMPLAINT**
: **21MJ00774**

- v. -

:

JARRETT CRISLER, Jr., : Violations of
a/k/a "Jayecee," : 18 U.S.C. §§ 924(c) and 2
Defendant. : COUNTY OF OFFENSE:
: WESTCHESTER

- - - - - x

SOUTHERN DISTRICT OF NEW YORK, ss.:

PATRICK LEWIS, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE

(Discharge of a Firearm in Furtherance of a Crime of Violence)

1. On or about October 24, 2020, in the Southern District of New York and elsewhere, JARRETT CRISLER, Jr., a/k/a "Jayecee," the defendant, and others known and unknown, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, an attempted murder and assault with a dangerous weapon in aid of racketeering activity in violation of Title 18, United States Code, Sections 1959(a)(3) and (5), knowingly did use and carry a firearm, and in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, which was brandished and discharged, to wit, CRISLER shot at rival gang members in Miami, Florida, in order to protect a fellow gang member who was being threatened.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), and (iii) and 2.)

GSG, has a hierarchical leadership structure, or "lineup," for street leaders in different geographic locales.

c. During the course of this investigation, the FBI identified JARRETT CRISLER, Jr., a/k/a "Jayecee," the defendant, as a Florida-based member of Gorilla Stone who acted as a gun trafficker for New York-based members of Gorilla Stone. On or about December 1, 2020, pursuant to a complaint signed by the Honorable Katharine H. Parker, United States Magistrate Judge for the Southern District of New York, CRISLER was arrested for conspiring to traffic firearms to fellow Gorilla Stone Members in New York (the "CRISLER Complaint"). The CRISLER Complaint is attached as Exhibit B to this Complaint and incorporated by reference herein. On or about December 7, 2020, a grand jury sitting in the Southern District of New York returned an indictment charging CRISLER with firearms trafficking and conspiracy to do the same, in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 371 (the "CRISLER Indictment"). The CRISLER Indictment is attached as Exhibit C and incorporated by reference herein.

d. During CRISLER's arrest discussed above, law enforcement recovered a cellphone from CRISLER (the "CRISLER Phone"), which law enforcement has searched pursuant to a judicially authorized search warrant. Based on my review of the CRISLER Phone, I know the following picture was stored on that phone:

f. As set forth in detail in the CRISLER Complaint at paragraph 4, CRISLER used social media to publicize his membership in Gorilla Stone.

The October 24, 2020 Shooting

5. Based on my discussions with a detective from the Doral Police Department and my review of news coverage, I know that in the early morning hours of October 24, 2020, a shooting occurred in front of the KOD Miami Strip Club, during which two victims were shot (the "October 24 Shooting"). As set forth below, JARRETT CRISLER, Jr., a/k/a "Jayecee," the defendant, admitted to committing the October 24 Shooting in order to protect a fellow Gorilla Stone member who was being threatened by rival gang members.

6. Based on my review of the CRISLER Phone, I have learned, among other things, the following:

a. On or about the morning of October 24, 2020 (*i.e.*, several hours after the shooting), CRISLER exchanged a series of messages using Signal² with a fellow member of Gorilla Stone ("Member-1").³ The messages sent by CRISLER are in white text with the green background:

² Based on my discussions with other law enforcement officers and my own investigation of how Signal operates, I know that Signal is an encrypted messaging application that offers users the option of auto-deleting messages at set intervals.

³ I believe Member-1 is a member of Gorilla Stone because, based on my review of the extraction from the CRISLER Phone, I know Member-1 and the defendant have had several conversations about growing and managing Gorilla Stone.

b. Approximately two days later, on or about October 26, 2020, CRISLER texted Member-1 and continued to discuss the October 24 Shooting by stating it made "the news" and there were two victims ("2 of them"). The defendant continued to brag about his marksmanship ("I ain't miss a shot," "Greatest shot in the world"):

SupersaiyanStatik SupersaiyanStatik (owner)
It's on the news. 2 of them I only shot twice meaning I ain't miss a shot
10/26/2020 8:02:59 PM(UTC-4)

Source Extraction:
Legacy
Source Info:
00008039-00114C920E9A802E_files_partial-afu.zip/private/var/mobile/Containers/Shared/AppGroup/92097A4F-38D4-42F7-AB93-83DD8744714E/grdb/sqlite/sqlite.decrypted : 0x14D12D0 (Table: model_TSInteraction, model_OWSUserProfile, Size: 22642688 bytes)

SupersaiyanStatik SupersaiyanStatik (owner)
Greatest shot in the world U tryna challenge me? Lol
10/26/2020 8:03:13 PM(UTC-4)

In response to Member-1's question about where he could find news about the October 24 Shooting, CRISLER responded:

SupersaiyanStatik SupersaiyanStatik (owner)
Miami club shooting. My mom just showed me the clip
10/26/2020 8:03:50 PM(UTC-4)

Member-1 responded by chiding the defendant, stating "Attempts don't count we gotta go finish that," which, based on my training, experience, and involvement in this investigation, was Member-1's way of saying that CRISLER should ensure that Rival-1 and the other victim were dead. In response, CRISLER wrote:

WHEREFORE, the deponent prays that a warrant be issued for the arrest of JARRETT CRISLER, Jr., a/k/a "Jayecee," the defendant, and that he be imprisoned or bailed, as the case may be.

/s/ Patrick Lewis (by AEK, with permission)
(known to the Court)

PATRICK LEWIS
SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

Sworn to me through the transmission
of this Affidavit by reliable electronic means,
pursuant to Federal Rules of Criminal Procedure
41(d) (3) and 4.1, this 20th day of January, 2021.

Andrew Krause

By FaceTime

THE HONORABLE ANDREW E. KRAUSE
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK